



United States Attorney  
Eastern District of New York

AB:WK:smm  
F. #2009R00195  
Discovery 3

271 Cadman Plaza East  
Brooklyn, New York 11201

May 9, 2011

**BY ECF**

TO: ALL COUNSEL

Re: United States v. Vincent Dragonetti, et al.  
Criminal Docket No. 11 CR 3 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. The government hereby reiterates its request for reciprocal discovery.

The items described below are located at First Choice Copy. You may obtain these items by contacting Joe Meisner at (718) 381-1480 x.212, or [jmeisner@nyc.rr.com](mailto:jmeisner@nyc.rr.com). Please reference print order number **26328**.

**SURVEILLANCE**

Discovery Exhibit 45 consists of CDs containing surveillance photographs and/or videos of one or more of the defendants. These CDs, marked with the Bates Numbers noted herein, were previously provided in United States v. Bombino, et al., Criminal Docket No. 10-147 (SLT) (E.D.N.Y. 2010).

Description	Defendant(s)	Bates Range
CD containing surveillance photographs dated 4/26,27/05; 9/12/06; 10/15/06; 3/16,20,26,27,28/07; 4/11,19/07; 5/29/07; 6/4,27/07; 7/5,16/07; 9/12,14/07; 10/11/07; and 11/7/07	A. O'Donnell - 3/16/07, 3/26/07, 3/28/07, 4/11/07, 6/4/07, 6/27/07, 7/5/07, 7/16/07, 9/12/07, 9/14/07 T. Frangiapani - 3/16/07	28873

<b>Description</b>	<b>Defendant(s)</b>	<b>Bates Range</b>
CD containing surveillance photographs dated 1/9/06	None	28874
CD containing surveillance photographs dated 7/27/06	None	28875
CD containing surveillance photographs dated 7/31/06	None	28876
CD containing surveillance photographs dated 8/28/06	V. Dragonetti T. Frangiapani	28877
CD containing surveillance photographs dated 8/28/06	A. O'Donnell V. Dragonetti T. Frangiapani	28878
CD containing surveillance photographs dated 9/12/06	None	28879
CD containing surveillance photographs dated 9/21/06; 10/4/07; 11/5/07; 12/6/07; 12/11/07; and 12/17/07	None	28880
CD containing surveillance photographs dated 10/19/06	None	28881
CD containing surveillance photographs dated 10/25/06	None	28882
CD containing surveillance photographs dated 11/14/06	None	28883
CD containing surveillance photographs dated 11/17/06	A. O'Donnell T. Frangiapani V. Dragonetti	28884
CD containing surveillance photographs dated 12/15/06	A. O'Donnell	28885
CD containing surveillance photographs dated 1/2/07	A. O'Donnell	28886
CD containing surveillance photographs dated 1/5/07	A. O'Donnell T. Frangiapani	28887
DVD containing video surveillance dated 5/27/07	None	28888

Description	Defendant(s)	Bates Range
DVD containing video surveillance dated 6/21/07	None	28889
CD containing surveillance photographs dated 8/9/07	None	28890
DVD containing video surveillance dated 1/24/08	None	28891
DVD containing video surveillance dated 1/28/08	None	28892
CD containing surveillance photographs dated 2/5/08 and 3/10/08	A. O'Donnell - 2/5/08	28893
CD containing surveillance photographs dated 2/6/08	A. O'Donnell	28894
CD containing surveillance photographs dated 2/8/08	None	28895
CD containing surveillance photographs dated 2/13/08	A. O'Donnell	28896
CD containing surveillance photographs dated 2/19/08	None	28897
CD containing surveillance photographs dated 2/20/08	A. O'Donnell	28898
CD containing surveillance photographs dated 2/21/08	None	28899
CD containing surveillance photographs dated 2/21,26/08 (1 of 2)	A. O'Donnell - 2/21/08	28900
CD containing surveillance photographs dated 2/26/08 (2 of 2)	A. O'Donnell	28901
CD containing surveillance photographs dated 2/26/08	None	28902
CD containing surveillance photographs dated 2/28/08	None	28903
CD containing surveillance photographs dated 2/28,29/08	A. O'Donnell	28904

Description	Defendant(s)	Bates Range
CD containing surveillance photographs dated 2/29/08	A. O' Donnell	28905
CD containing surveillance photographs dated 3/3/08	None	28906
CD containing surveillance photographs dated 3/3/08	None	28907
CD containing surveillance photographs dated 3/10/08	None	28908
CD containing surveillance photographs dated 3/10,12/08	A. O' Donnell - 3/12/08	28909
CD containing surveillance photographs dated 3/12/08	A. O' Donnell	28910
CD containing surveillance photographs dated 3/14/08	A. O' Donnell	28911
CD containing surveillance photographs dated 3/14/08	None	28912
CD containing surveillance photographs dated 3/21/08	A. O' Donnell	28913
CD containing surveillance photographs dated 3/21,24/08	A. O' Donnell - 3/21/08, 3/24/08	28914
CD containing surveillance photographs dated 3/24/08	A. O' Donnell	28915
CD containing surveillance photographs dated 3/25/08	None	28916
CD containing surveillance photographs dated 3/25,27/08	A. O' Donnell - 3/27/08	28917
CD containing surveillance photographs dated 3/28/08	None	28918
CD containing surveillance photographs dated 3/31/08 and 4/1,2,4/08	A. O' Donnell	28919
CD containing surveillance photographs dated 4/1/08	None	28920

Description	Defendant(s)	Bates Range
CD containing surveillance photographs dated 4/2/08	A. O' Donnell	28921
CD containing surveillance photographs dated 4/3, 4/08	A. O' Donnell - 4/3/08, 4/4/08	28922
CD containing surveillance photographs dated 4/7/08	None	28923
CD containing surveillance photographs dated 4/7/08	None	28924
CD containing surveillance photographs dated 4/8/08	A. O' Donnell	28925
CD containing surveillance photographs dated 4/8, 9/08	A. O' Donnell - 4/8/08	28926
CD containing surveillance photographs dated 4/11/08	A. O' Donnell	28927
CD containing surveillance photographs dated 4/14/08	None	28928
CD containing surveillance photographs dated 4/14/08	A. O' Donnell	28929
CD containing surveillance photographs dated 4/16/08	None	28930
CD containing surveillance photographs dated 4/17/08	A. O' Donnell	28931
CD containing surveillance photographs dated 4/17/08	A. O' Donnell	28932
CD containing surveillance photographs dated 4/21/08	A. O' Donnell	28933
CD containing surveillance photographs dated 4/21/08	A. O' Donnell	28934
CD containing surveillance photographs dated 4/22/08	A. O' Donnell	28935
CD containing surveillance photographs dated 4/23/08	A. O' Donnell	28936
CD containing surveillance photographs dated 4/23/08	A. O' Donnell	28937

Description	Defendant(s)	Bates Range
CD containing surveillance photographs dated 4/24, 25, 28, 29/08	A. O' Donnell - 4/25/08	28938
CD containing surveillance photographs dated 4/25/08	A. O' Donnell	28939
CD containing surveillance photographs dated 4/28/08	None	28940
CD containing surveillance photographs dated 4/29/08	None	28941
CD containing surveillance photographs dated 5/1/08	None	28942
CD containing surveillance photographs dated 5/1/08	None	28943
CD containing surveillance photographs dated 5/5/08	None	28944
CD containing surveillance photographs dated 5/6/08	None	28945
CD containing surveillance photographs dated 5/6/08	A. O' Donnell	28946
CD containing surveillance photographs dated 5/7/08	A. O' Donnell	28947
CD containing surveillance photographs dated 5/9/08	A. O' Donnell	28948
CD containing surveillance photographs dated 5/12/08	A. O' Donnell	28949
CD containing surveillance photographs dated 5/15/08	A. O' Donnell	28950
CD containing surveillance photographs dated 5/15/08	A. O' Donnell	28951
CD containing surveillance photographs dated 5/28/08	A. O' Donnell	28952
CD containing surveillance photographs dated 5/28/08	None	28953

<b>Description</b>	<b>Defendant(s)</b>	<b>Bates Range</b>
CD containing surveillance photographs dated 5/29/08	None	28954
CD containing surveillance photographs dated 6/5/08	None	28955
CD containing surveillance photographs dated 6/6/08	None	28956
CD containing surveillance photographs dated 6/10/08	None	28957
CD containing surveillance photographs dated 6/11/08	None	28958
CD containing surveillance photographs dated 6/17/08	None	28959
CD containing surveillance photographs dated 6/18/08	None	28960
CD containing surveillance photographs dated 6/20/08	A. O'Donnell	28961
CD containing surveillance photographs dated 6/23/08	None	28962
CD containing surveillance photographs dated 6/25/08	None	28963
CD containing surveillance photographs dated 6/25/08	None	28964
CD containing surveillance photographs dated 7/8/08	None	28965
CD containing surveillance photographs dated 7/8/08	None	28966
CD containing surveillance photographs dated 7/9/08	None	28967
CD containing surveillance photographs dated 7/10/08	None	28968
CD containing surveillance photographs dated 7/10/08	A. O'Donnell	28969
CD containing surveillance photographs dated 7/14/08	A. O'Donnell	28970

<b>Description</b>	<b>Defendant(s)</b>	<b>Bates Range</b>
CD containing surveillance photographs dated 7/16/08	None	28971
CD containing surveillance photographs dated 7/17, 22/08	A. O'Donnell - 7/17/08, 7/22/08	28972
CD containing surveillance photographs dated 7/21/08	None	28973
CD containing surveillance photographs dated 7/21/08	None	28974
CD containing surveillance photographs dated 7/23/08	None	28975
CD containing surveillance photographs dated 7/23, 28/08 and 8/29/08	None	28976
CD containing surveillance photographs dated 7/24/08	None	28977
CD containing surveillance photographs dated 7/24/08	None	28978
CD containing surveillance photographs dated 8/5/08	None	28979
CD containing surveillance photographs dated 8/6/08	None	28980
CD containing surveillance photographs dated 8/8/08	None	28981
CD containing surveillance photographs dated 8/11/08	None	28982
CD containing surveillance photographs dated 8/12/08	None	28983
CD containing surveillance photographs dated 8/14/08	None	28984
CD containing surveillance photographs dated 8/14/08	None	28985
CD containing surveillance photographs dated 8/19, 21/08	None	28986

Description	Defendant(s)	Bates Range
CD containing surveillance photographs dated 8/20/08	None	28987
CD containing surveillance photographs dated 8/22,25/08	A. O' Donnell - 8/22/08	28988
CD containing surveillance photographs dated 8/29/08	None	28989
CD containing surveillance photographs dated 8/29/08	None	28990
CD containing surveillance photographs dated 8/29/08	None	28991
CD containing surveillance photographs dated 9/2/08	None	28992
CD containing surveillance photographs dated 9/3/08	None	28993
CD containing surveillance photographs dated 9/4/08	None	28994
CD containing surveillance photographs dated 9/5/08	A. O' Donnell	28995
CD containing surveillance photographs dated 9/9,10/08	A. O' Donnell - 9/9/08, 9/10/08	28996
CD containing surveillance photographs dated 9/11/08	None	28997
CD containing surveillance photographs dated 9/11,15/08	A. O' Donnell - 9/15/08	28998
CD containing surveillance photographs dated 9/19,22,23/08	None	28999
CD containing surveillance photographs dated 9/24/08	A. O' Donnell	29000
CD containing surveillance photographs dated 9/25/08	A. O' Donnell	29001
CD containing surveillance photographs dated 9/26/08	None	29002

<b>Description</b>	<b>Defendant(s)</b>	<b>Bates Range</b>
CD containing surveillance photographs dated 10/2/08	None	29003
CD containing surveillance photographs dated 10/2/08	None	29004
CD containing surveillance photographs dated 10/16/08	None	29005
CD containing surveillance photographs dated 11/11/08	None	29006
CD containing surveillance photographs dated 11/12/08	None	29007
CD containing surveillance photographs dated 12/13/08	None	29008
CD containing surveillance photographs dated 12/17/08	None	29009
CD containing surveillance photographs dated 1/7/09	None	29010
CD containing surveillance photographs dated 1/13/09	None	29011
CD containing surveillance photographs dated 1/22/09	None	29012
CD containing surveillance photographs dated 2/5/09	None	29013
CD containing surveillance photographs dated 2/10/09	None	29014
CD containing surveillance photographs dated 2/11/09	None	29015
CD containing surveillance photographs dated 2/11/09	None	29016
CD containing surveillance photographs dated 3/3/09	None	29017
CD containing surveillance photographs dated 3/6/09	None	29018

Description	Defendant(s)	Bates Range
CD containing surveillance photographs dated 3/19/09	None	29019
CD containing surveillance photographs dated 3/30/09	None	29020
CD containing surveillance photographs dated 4/7/09	None	29021
CD containing surveillance photographs dated 4/13/09	None	29022
CD containing surveillance photographs dated 4/17/09	None	29023
CD containing surveillance photographs dated 4/21/09	None	29024
CD containing surveillance photographs dated 4/28/09	None	29025
CD containing surveillance photographs dated 5/19/09	None	29026
CD containing surveillance photographs dated 5/20/09	None	29027
CD containing surveillance photographs dated 5/26/09	None	29028
CD containing surveillance photographs dated 6/4/09	None	29029
CD containing surveillance photographs dated 6/16/09	None	29030
CD containing surveillance photographs dated 8/14/09	None	29031
CD containing surveillance photographs dated 8/20/09	None	29032
CD containing surveillance photographs dated 9/1/09	None	29033
CD containing surveillance photographs dated 9/15/09	None	29034

<b>Description</b>	<b>Defendant(s)</b>	<b>Bates Range</b>
CD containing surveillance photographs dated 9/17/09	None	29035
CD containing surveillance photographs dated 10/7/09	J. Lombardi	29036
CD containing surveillance photographs dated 10/13/09	J. Lombardi	29037
CD containing surveillance photographs dated 10/16/09	None	29038
CD containing surveillance photographs dated 10/22/09	None	29039
CD containing surveillance photographs dated 10/30/09	J. Lombardi	29040
CD containing surveillance photographs dated 11/5/09	J. Lombardi	29041
CD containing surveillance photographs dated 11/13/09	None	29042
CD containing surveillance photographs dated 11/20/09	None	29043
CD containing surveillance photographs dated 12/1/09	None	29044
CD containing surveillance photographs dated 12/8/09	None	29045
CD containing surveillance photographs dated 12/10/09	J. Lombardi	29046
CD containing surveillance photographs dated 12/16/09	None	29047

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Shernita M. Moore  
Paralegal Specialist  
(718) 254-6101

cc: Clerk of Court (DLI)